

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

$$\mathbf{V}_i$$

No. 3:14-00100-1
JUDGE SHARP

JOSE NAVARRETE-BRAVO

Jose Navarrete-Bravo, through counsel and pursuant to Rule 15(c)(2) of the *Federal Rules of Criminal Procedure*, respectfully moves the Court to allow his presence during the taking of the depositions of material witnesses scheduled to take place on August 14, 2014. (D.E. 86). Mr. Navarrete-Bravo would show as follows:

1. On July 25, 2014, the government filed a notice to take depositions of material witnesses Antonio Tadeo Sontiso, EMBLH, (a juvenile), MHJTA (a juvenile) and JCVR (a juvenile). (D.E. 86).

2. Federal Rule of Criminal Procedure 15(c)(2) states as follows:

(c)(2) Defendant not in custody. A defendant who is not in custody has the right upon request to be present at the deposition, subject to any conditions imposed by the court.

3. Mr. Navarrete-Bravo wishes to be present during the taking of the deposition since he can substantially aid his counsel in his defense and in framing proper questions during the course of the deposition.

4. Mr. Navarrete-Bravo does not waive his right, should he choose to exercise that right, to be present during all critical phases of his case and to assist his counsel in providing effective assistance of counsel in his case.

WHEREFORE for the foregoing reasons, it is respectfully requested that the Court allow Mr. Navarrete-Bravo to be present at the depositions of material witnesses scheduled for August 14, 2014 subject to any conditions imposed by the Court.